

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KOBEAY SWAFFORD, as an individual, ,

CASE NO. 1:24-cv-10509

Plaintiff(s),

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RENTGROW, INC. and DOES 1-10 inclusive,

Defendants.

PLAINTIFF'S MOTION TO EXTEND FACT DISCOVERY DEADLINE

This action arises out of Defendant Rentgrow, Inc's misreporting of Plaintiff's conviction records. Defendant has already sold two erroneous reports to Plaintiff's prospective landlords stating that Plaintiff is currently serving a life sentence for, among other charges, premeditated murder. Despite having his convictions dismissed, Defendant continued to insist to this day that Defendant's failure to disclose the dismissals was accurate; refused to fix Plaintiff's report despite his dispute; falsely claimed that Plaintiff never provided documentation in support of his dispute; and refused to acknowledge the existence of the dismissal ordered by the Michigan Supreme Court which is a matter of public record. No amended report has ever been issued by Defendant and Defendant's insistence that its reports are accurate has caused Plaintiff to believe that Defendant will continue to issue similar erroneous reports for his future housing applications causing him great emotional distress. Plaintiff believes that this is a punitive damage case.

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